pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT

NPDES COMPLIANCE INSPECTION REPORT

NPDES Permit No.	Mo/Day/Yr	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID
PA0044741	4/18/2019	10:00		CEI	

Facility Name:	Permittee Name:
Hanover Foods IWTP	Hanover Foods Corporation

Physical Location/Directions:	Permit Expiration Date:
1550 York Street, Hanover, PA 17331	09/30/2020

Municipality:	County:	Permit Renewal Application Due:
Penn Township	York	03/31/2020

Facility Type: ☐ Sewage ■ Industrial Waste ☐ Industrial Stormwater ☐ Other:
☐ Major ■ Minor

Responsible Person:	Certified Operator Required: ☐ Yes ■ No
David Still	Certified Operator in Responsible Charge:
Title: Vice President - Operations	Eric Eckersley
Permittee Address: PO Box 334 1486 York Street Hanover, PA 17331	Client ID: Class-Subclass(es): Circuit Rider: ☐ Yes ■ No
Business Phone: 717.632.6000 Fax: Email: dstill@hanoverfoods.com	Business Phone: 717.632.6000 xt 1214 Cell: Email: eeckersley@hanoverfoods.com

24-Hour Emergency Contact Person / Phone:

VIOLATIONS: (list below) ■ Yes ☐ No ☐ Pending Sample Results

UV disinfection system offline for Outfall 001 is in violation of Part B.I.E of your NPDES Permit; Failure to properly operate and maintain all facilities which are installed or used to achieve compliance

Person Interviewed:	Date:	Inspector:	Date:
Eric Eckersley	04/18/2019	Austen Randecker	4/18/2019
Signature: Report sent via mail	Phone No.: 717.632.6000	Inspector Signature: Austen Randecker	Phone No.: 717.503.7121
Title: Operator		Title: Water Quality Specialist	
Email: eeckersley@hanoverfoods.com		Email: arandecker@pa.gov	

This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records.

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Comments
A CEI inspection was conducted today by the Department's Clean Water Program. In attendance for the inspection was Austen Randecker (Water Quality Specialist), Erick Ammon (Compliance Specialist), and Summer Kunkel (Water Quality Specialist Supervisor). We were met on-site by David Still (VP – Operations) and by Eric Eckersley (Plant Operator) who accompanied us on the inspection.
Treatment plant receives industrial waste from canning operations as well as NCCW. Industrial waste is treated as a pre-treatment operation for Penn Township STP. NCCW is treated and discharged to Oil Creek at Outfall 001. Influent flow from industrial canning operations passes through screening, online during inspection, before entering the grit removal chamber. There were some food particles on the ground surface. Mr. Eckersley stated that the screening area is cleaned daily. Screenings are collected and stored in the residual storage pad for land application. During periods of high flows an EQ/Surge tank can be put online to store extra flow and can be fed back to the wet well by a flow metering device in the screening area. Influent samples are collected for weekly testing and for daily COD.
After screening and grit removal industrial waste is pumped to 1 of 2 bio-reactors via 3 influent wet well pumps. Bio-reactor #2 was online during the inspection. Bio-reactor #1 and clarifiers 1 and 2 were offline due to maintenance. Reactor #1 is currently operating at 90 degrees F or less and is designed to operate at ~95 degrees F. Mr. Eckersley states that heat exchanger may not be sufficient enough to maintain design temperature, there has been discussion of installing a heat exchanger on the IW/NCCW lines to help aide the temperature in the bio-reactor. The reactor has ability to flare gas, normal operations use the gas as fuel for the heat exchanger.
Flow from bio-reactor #2 is fed to a splitter box that diverts flow between primary clarifier 3 and 4, both online during the inspection. Clarifiers 3 and 4 are experiencing short-circuiting, gas release, and solids carry over in multiple areas along the weirs. There is algae accumulation in the effluent weir notches. RAS from the clarifiers is sent to a RAS pit. There is a valve in the RAS pit that is used to waste sludge. Wasted sludge is sent to the Slurry tank and ultimately is land applied. Effluent from clarifier 3 and 4 is gravity fed to aeration lagoon #1.
Lagoon #1 is currently experiencing spring "turn over". Lagoon #1 was a milky brown/grey color and there were no significant odors, scum, or floatables. The liner appears to be in good repair. Lagoon #1 is equipped with mixers and aerators. Due to spring "turn over" lagoon #1 is being aerated very little for increased settling to prevent solids carryover. Effluent from lagoon #1 is sampled and is then sent to Penn Township WWTP for final treatment. Flow to Penn Township during the inspection was 0.544 MGD.
NCCW is also treated on-site. NCCW flow enters aeration lagoon #2. Lagoon #2 appeared clear and had a green/brown tint. No rips/ tears were noted with the liner and there were numerous snails present on the liner. Lagoon #1 has mixers and aerators, offline during the inspection. Flow from lagoon #1 is sent to a splitter box where flow is diverted to 2 polishing ponds. Aeration in the polishing ponds was off during inspection. The polishing ponds are experiencing heavy algae growth, which fouls the aerator motors. The fence around the polishing ponds is experiencing heavy erosion.

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Comments

Effluent from the polishing ponds is sent to disinfection before being discharged to Oil Creek at Outfall 001. A UV system is in place for disinfection and the unit was "OFF" during the time of inspection and was turned to "AUTO" during the inspection. Mr. Eckersley stated that the UV system was turned to "OFF" to remove the algae accumulation on the UV bulbs from the polishing tanks ~2 weeks ago. The UV system has a PLC and SCADA that can be viewed and operated from the control building. Effluent composite samples are collected from the effluent line post UV disinfection. Flow from the UV unit is gravity fed to Outfall 001. The stream discharge pipe was submerged during the time of the inspection. The outfall appeared clear and no solids, foam, or scum was notable in Oil Creek. Oil Creek upstream and downstream of the outfall appeared clear.

Recommendations:
-Cleanup and housekeeping of residual waste storage pad and slurry tank
-Sampling NCCW influent 1/week for process control
-Adjusting wasting rates/transfer from clarifiers to slurry tank
-Repair of inoperable mixers and aerators in lagoons/polishing ponds
-Fixing the fencing and erosion gully around the polishing ponds
-Rake and dispose of algae from the ground surface around polishing ponds
-Notify the Department of any "pilot" studies relating chemical additions
-Notify the Department of conducting any temperature changes within the Bio-reactor
-Labeling and posting all outfalls

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Monitoring, Reporting and Recordkeeping
(NPDES Permit Part A)

On-site laboratory: ■ Registered ☐ Accredited ☐ N/A ☐ Not Registered/Accredited
On-site analyses: ■ pH ■ DO ■ TRC ☐ All NPDES parameters ☐ None
■ Other(s): Temperature
DEP Lab Registration/Accreditation #: 67-01061 Lab Supervisor:
Comments:

Contract Laboratory Name: ALS Environmental DEP Lab Accreditation #: 22-00293
Address & Phone: 301 Fulling Mill Road, Middletown
Parameters Analyzed: color, CBOD, TSS, O/G, fecal, NH3-N, Total Phos, Total Cadmium, Total nitrogen series
Comments:

Sample Collection: Influent sampling location: No NCCW influent sample collected
Effluent sampling location: Post UV system
Location(s) adequate for representative samples: ■ Yes ☐ No
Parameters analyzed, sample frequencies and sample types meet permit requirements: ■ Yes ☐ No
Samples properly preserved during collection, storage and shipping: ■ Yes ☐ No
Sampler or sample temperature is recorded using NIST traceable thermometer: ■ Yes ☐ No
Comments:

Composite samples: Being collected: ■ Yes ☐ No Composites are: ☐ 8-hour ■ 24-hour ☐ Other
Samples are: ■ Flow Proportional ☐ Time Proportional
Sampler controlled by: ☐ Influent flow meter ■ Effluent flow meter
Minimum aliquot volume greater than 100 ml: ■ Yes ☐ No
Composite sampler temperature during inspection: 4C
Comments:

Sample records: Available for inspection: ■ Yes ☐ No Retained for at least three years: ■ Yes ☐ No
Includes: Collector name: ■ Yes ☐ No Collection date/time: ■ Yes ☐ No Collection location: ■ Yes ☐ No
Analyst name: ■ Yes ☐ No Analysis date/time: ■ Yes ☐ No Analysis Results: ■ Yes ☐ No
Analytical methods & quantitation limits: ■ Yes ☐ No Chain-of-Custody forms: ☐ Yes ☐ No
Comments:

Bench sheets: Data is consistent with data on the DMR: ■ Yes ☐ No ☐ N/A Month(s)/year checked: September 2018
Comments:

Field Testing: Completed within required hold time: ■ Yes ☐ No
Equipment is calibrated as required: pH: ■ Yes ☐ No DO: ■ Yes ☐ No TRC: ☐ Yes ☐ No ■ N/A
Other(s): ☐ Yes ☐ No
Calibration records maintained: ■ Yes ☐ No
Comments: Some buffer solutions were out of date, recommend verifying chlorine meter against secondary standards

DMR Submittal: DMRs are submitted as required: ■ Yes ☐ No eDMR User: ■ Yes ☐ No
DMR Supplemental Reports are submitted as required: ■ Yes ☐ No
DMRs include all sample results collected and analyzed using approved methods: ■ Yes ☐ No
Comments:

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Flow Measurement
(NPDES Permit Part A)

Primary flow meter and recorder: Operable: ■ Yes ☐ No Properly maintained: ■ Yes ☐ No
Measuring device type: ☐ Flume ☐ Weir ■ Full Pipe ☐ Open Channel ☐ Other:
Meter type: ☐ Ultrasonic ■ Magnetic Meter ☐ Bubbler ☐ Other:
Meter location: Post UV system
Recorder type: ■ Totalizer ☐ Daily Chart ☐ 7-Day Chart ■ SCADA/Electronic ☐ Other:
Capable of recording maximum flows: ■ Yes ☐ No Calibration Range: unknown
Inspection frequency: ■ Daily ☐ Weekly ☐ Other:
Calibration frequency: annual Date of last calibration: 12-20-2018
Measuring device, meter and recorder included as part of flow meter calibration: ■ Yes ☐ No ☐ N/A
Influent flow is measured before all return lines: ■ Yes ☐ No Influent flow is measured after hauled-in wastes: ☐ Yes ☐ No
Effluent flow is measured after all withdraws: ■ Yes ☐ No
Comments:

Flumes: Flow is uniform across the channel: ☐ Yes ☐ No ■ N/A Flume is free of debris and deposits: ☐ Yes ☐ No ■ N/A
Comments:

Weirs: Clean with a visible air space below the nappe: ☐ Yes ☐ No ■ N/A
Comments:

Treatment Plant
(NPDES Permit Part B)

Treatment plant bypass: Since last inspection: ☐ Yes ■ No Reported to DEP: ☐ Yes ☐ No
Location/cause:

Major equipment repair/replacement: Since last inspection: ☐ Yes ☐ No Date of last inspection: CEI on 7/20/16
Repair List: New bioreactor, 2 new clarifiers, UV system

Stand-by power: ■ Emergency generator ☐ Dual power feed ☐ None ☐ Other:
System operable: ■ Yes ☐ No Exercise frequency: weekly Maintenance frequency: annual
Comments:

Alarms: Type: ☐ None ■ SCADA ☐ Auto Dialer ☐ PLC ■ Other: light alarm
System operable: ■ Yes ☐ No Test frequency:
Alarm triggers: high/low levels

Staffing schedule: ☐ 24/7 Weekday hours: 0500 to 1300 Weekend/Holiday hours: Varies
Other:

On site Logs: Logs up-to-date: ■ Yes ☐ No ☐ N/A
Daily Log contains: ☐ Visual observations ■ Process adjustments ■ Problems and concerns
Repair log maintained: ■ Yes ☐ No Routine maintenance log maintained: ■ Yes ☐ No
Comments: Repair and maintenance included in daily log

Spare parts inventory: maintained: ■ Yes ☐ No ■ Standby units available
Comments:

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Treatment Process Units
(NPDES Permit Part B)

Water Quality Management Permit No.

All treatment units are as noted in permit: ☐ Yes ☐ No

Treatment Units	Total	On-Line	Inoperable	Comments
Screening	1	1		
Grit Removal	1	1		
Surge Tank (EQ)	1	1		
Bio-reactor	2	1	0	Reactor #1 offline for maintenance
Primary Clarifier	4	2	0	#1 and #2 offline for maintenance
Aeration Lagoons	2	2		
Polishing ponds	2	2		
UV System	1	0	1	UV system was in "off" mode during inspection
Residual Storage Pad				Under roof cover
Slurry Tank				Leaking slightly

Chemical Additions: MgOH, sulfuric acid, ByoGon, polymer/coagulant, Urea

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Process Control (NPDES Permit Part B)

Frequency of Testing	Current Testing Results
☐ Settleability	
☐ Dissolved Oxygen	
■ Sludge Blanket	Clarifier 3 and 4: 7 Feet
■ Mixed Liquor Suspended Solids ☐ MLVSS	9600
☐ Microscopic exam of MLSS	
☐ Color ☐ Odor	Comments/observations/results:

■ Other: pH: 6.38 SU; Alkalinity: 540 mg/l

Other Requirements (NPDES Permit Part C)

Special Conditions: Next submission/action: Due Date:

☐ WETT:
☐ TRE/TIE:
☐ EPA Pretreatment Program ☐ Annual report submitted:
■ Stormwater requirements: sampling at 002 and 003
☐ Permit Schedule:
☐ TMDL:
■ Other: C-Bay nutrient monitoring
Comments:

Emergency Response/PPC Plan: on-site: ■ Yes ☐ No ☐ N/A Last updated:
Flood response plan available: ☐ Yes ☐ No ■ N/A
Comments: Update the Department's South Central Regional #: 717-705-4700

Compliance History

History of noncompliance: with discharge effluent limits: ■ Yes ☐ No
Recent Compliance Actions: ■ Yes ☐ No
Comments:

Legal Agreement: Consent Order and Agreement, Consent Decree or Order: ■ Yes ☐ No Date executed: 01/03/2017
In compliance with legal agreement: ☐ Yes ■ No
Obligations due next: Quarterly reports
Comments:

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Effluent/Receiving Water Evaluation

Outfall Number(s): 001 | **Stream Name:** Oil Creek

DEP Collector #: 2660
Sample Date/Time:
Sample Location: Outfall 001 stream discharge pipe to Oil Creek

Effluent pipe was submerged

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow		0.00		MGD
pH				S.U.
Conductivity				µmhos/cm
Dissolved Oxygen				mg/L
Total/Free Chlorine Residual				mg/L
Temperature				°F

Upstream Observations: Clear

Outfall Observations: Clear; no erosion and free of debris

Downstream Observations: Clear

Outfall Number(s): | **Stream Name:**

DEP Collector #:
Sample Date/Time:
Sample Location:

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow				MGD
pH				S.U.
Conductivity				µmhos/cm
Dissolved Oxygen				mg/L
Total/Free Chlorine Residual				mg/L
Temperature				°F

Upstream Observations:

Outfall Observations:

Downstream Observations:

Outfall Number(s): | **Stream Name:**

DEP Collector #:
Sample Date/Time:
Sample Location:

Field Measurements:	Upstream	Outfall	Downstream	Units
Flow				MGD
pH				S.U.
Conductivity				µmhos/cm
Dissolved Oxygen				mg/L
Total/Free Chlorine Residual				mg/L
Temperature				°F

Upstream Observations:

Outfall Observations:

Downstream Observations: